## UNITED STATES DISTRICT COURT EASTERN DISTRICT MASSACHUSETTS

MARK M. THORNTON,
Plaintiff

V.
OCIVIL ACTION No. 03-12521-RGS
NORTHEAST BUILDERS TRANSPORT, INC.

And BARRY N. EHRSTEIN,
Defendants

## PLAINTIFF'S DISCLOSURE PURSUANT TO FED. R. CIV. P. 26

NOW COMES the plaintiff and makes the following disclosure pursuant to Fed. R. Civ. P. 26:

- (A) 1. Mark M. Thornton
  20 Glen Road
  Nashua, New Hampshire 03062
  603-883-6568
  - 2. Joslyn R. Thornton 20 Glen Road Nashua, New Hampshire 03062 603-883-6568
  - 3. Mark T. Thornton (son)
    20 Glen Road
    Nashua, New Hampshire 03062
    603-883-6568
  - 4. Trooper H.P. McAucliffe #2894
    Massachusetts State Police
    Medford Barrack
    Medford, Massachusetts
  - 5. Shawn Norton
    Medford Police Department
    520 Fellsway
    Medford, Massachusetts 02115
    781-396-0110
  - 6. Walter Hussey 781-665-3704

- 7. Phat S. Vong
  65 Fountain Street
  Medford, Massachusetts
- 8. Yvonne Velazquez
  Bristol-Myers Squibb Company
  P.O. Box 5200
  Princeton, New Jersey 08543-5200
  609-897-2000
- 9. Valerie Reister
  Bristol-Myers Squibb Company
  P.O. Box 5200
  Princeton, New Jersey 08543-5200
  609-897-2000
- 10. Xan Raskin
  Bristol-Myers Squibb Company
  345 Park Avenue
  New York, New York 10154-0037
  272-546-4000
- 11. Timothy Wert
  Bristol-Myers Squibb Company
  63 Autumn Drive
  Newtown, Pennsylvania 18940
  215-497-3147
- 12. Dennis Buckley
  Bristol-Myers Squibb Company
  1582 Brookfield Road
  Newtown, Pennsylvania 18940
  215-321-6961
- 13. Keeper of the Records
  Somerville Fire Department
  93 Highland Avenue
  Somerville, Massachusetts 02143
  617-623-1700
- 14. Keeper of the Records
  Massachusetts General Hospital
  P.O. Box 9693
  Boston, Massachusetts 02114-4693
  617-726-2159
- 15. Drs. Heaps, Price, and Goumas Four Seasons Orthopedics 505 West Hollis Street Nashua, New Hampshire 03062 603-883-0091

- 16. Keeper of the Records
  Southern New Hampshire Medical Center
  8 Prospect Street
  Nashua, New Hampshire 03060
  603-577-2000
- 17. Dr. Peter S. Hacker
  30 Dearborn Street
  Nashua, New Hampshire 03060
  603-883-2226
- 18. Keeper of the Records Occupational Health Center of Waltham 840 Winter Street Waltham, Massachusetts 02451
- 19. Dr. Glenn Philo, D.C.
  76 Northeastern Boulevard #32A
  Nashua, New Hampshire 03062
  603-889-0550
- 20. Keeper of the Records
  Elliott Hospital
  One Elliott Way
  Manchester, New Hampshire 03103
  603-669-5300
- 21. Keeper of the Records
  Healthsouth Sports Medicine
  505 West Hollis Street
  Nashua, New Hampshire 03060
  603-886-2710
- 22. Dr. Steven Rudman
  225 Bridge Street
  Manchester, New Hampshire 03104
  603-668-3509
- 23. Keeper of the Records
  New England Baptist Hospital
  125 Parker Hill Avenue
  Boston, Massachusetts 02120
- 24. Dr. James Rainville
  The Spine Center of New England Baptist Hospital
  125 Parker Hill Avenue
  Boston, Massachusetts 02120

- 25. Joyce Santostephano, Speech Therapist Catholic Medical Center 769 Main Street Manchester, New Hampshire 03102 603-641-6700
- 26. Dr. Joan P. Scanlon 19 Tyler Street, Suite 303 Nashua, New Hampshire 03060 603-881-7753
- 27. Dr. Richard W. Cullen
  300 Chestnut Street Suite 500
  Needham, Massachusetts 02492
  781-444-7137
- 28. Dr. Marc Sadowsky
  New England Neurological Associates
  220 Sutton Street
  North Andover, Massachusetts 01845
  978-687-2321
- 29. Orthopedic Physical Therapy Associates, Inc. 159 Main Dunstable Road, Suite 101 Nashua, New Hampshire 03060 603-881-5554
- 30. Dr. David R. Kosofsky
  Nashua Podiatry Associates
  166 Kinsley Street
  Nashua, New Hampshire 03060
  603-880-9177
- (B) To the extent that he has not already done so, the plaintiff shall provide defendant with all his medical records and invoices, all his employment records, and all accident and police reports.
- (C) The plaintiff computes his claim for pain and suffering by considering the amount of the reasonable and necessary medical expenses he has incurred, approximately \$41,144.22 and those which he will likely incur in the future, the nature and extent of his injuries, the nature and extent of his disability and discomfort, the severity of the impact in question, and the time he lost from his usual activities and employment.

Dated: March 1944, 2004

Respectfully submitted, MARK M. THORNTON By his attorney,

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has this date been forwarded to all parties the document by first-class mail, postage prepaid, as follows:

Michael B. Weinberg, Esquire John A. Donovan, Jr., Esquire Donovan Hatem LLP Two Seaport Lane Boston, Massachusetts 02210

Date: March 7 , 2004

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